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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JACK MARRONE, husband, KAREN
MARRONE, wife, both individually and
in their capacity as parents and guardians
for VIDA MARRONE, a minor, and
MATTHEW ADAM MARRONE,

Plaintiffs

vs.

ALLSTATE INSURANCE COMPANY,
LINDA M. EDLEMAN, FRED SCHAFER,
MT. GRETN A REALTY, and HOUSE
MASTERS

Civil Action No.: 1:CV-01-0773

(U.S. District Judge Yvette Kane)

JURY TRIAL DEMANDED

FILED
HARRISBURG, PA
JUL 02 2002

MARY E. D'ANDREA, CLERK
Per *[Signature]* Deputy Clerk

MOTION FOR EXTENSION OF TIME

AND Now come the Plaintiffs, by and through their counsel of record, Tarasi, Tarasi & Fishman, P.C. and Louis M. Tarasi, Jr., Esquire, and hereby file this Motion for Extension of Time, and in support thereof says the following:

1. On February 19, 2002, the Honorable Yvette Kane entered an Amended Case Management Order, after a status conference with the parties in this matter. The date set for the close of fact discovery was June 28, 2002.

2. On June 28, 2002, counsel for the parties were diligently pursuing discovery, and on that day met after two-days of depositions to concur (L.R. 7.1) that discovery should be extended in this matter, with consent of this Honorable Court. The parties have engaged in a diligent deposition schedule to date.

3. On June 28, 2002, after two-days of depositions, and after diligently pursuing discovery to date, the parties learned of several additional fact witnesses.

4. All counsel for the parties have met and concur in the presentment of this motion for an extension of time. (L.R. 7.1)

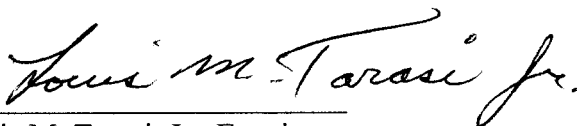
5. All counsel for the parties have met and agree that an additional sixty (60) days is necessary to complete fact discovery.

6. The Plaintiffs therefore request that the Amended Case Management Order be further amended to provide for a sixty (60) day extension of time for fact discovery and other required Court dates accordingly, *i.e.*, that the dates set in the Amended Case Management Order of February 19, 2002 be also extended an additional sixty (60) days.

Wherefore, the Plaintiffs respectfully request that this District Court enter an additional Amended Case Management Order accommodating and extending fact discovery and other requested Court dates accordingly in this case for an additional sixty (60) days for fact discovery and other required Court dates accordingly.

Respectfully submitted,

TARASI, TARASI & FISHMAN, P.C.

By: 

Louis M. Tarasi, Jr., Esquire
PA I.D. No. 01042
Attorney for the Plaintiffs
510 Third Avenue
Pittsburgh, PA 15219
P: (412) 391-7135
F: (412) 471-2673

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME** was served on counsel for the Defendants on this 1st day of July, 2002, by the United States Mail, First Class, Postage prepaid addressed as follows, and telefax:

James G. Nealon, III, Esquire
Telefax (717) 236-9119
Nealon & Grover, P.C.
2411 North Front Street
Harrisburg, PA 17110

John Flounlacker, Esquire
Telefax (717) 237-7105
Thomas, Thomas & Hafer, LLP
305 North Front Street
Harrisburg, PA 17108

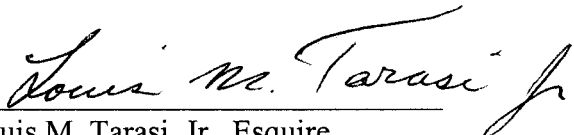
Edward A. Monsky, Esquire
Telefax (570) 343-9538
Fine, Wyatt & Carey, P.C.
425 Spruce Street
Scranton, PA 18501-0590

Jennifer L. Murphy, Esquire
Telefax (717) 232-4015
Duane, Morris & Heckscher, LLP
305 North Front Street, 5th Floor
Harrisburg, PA 17108-1003

TARASI, TARASI & FISHMAN, P.C.

Date: 7.1.02

By:



Louis M. Tarasi, Jr., Esquire
PA I.D. No. 01042
Attorney for the Plaintiffs
510 Third Avenue
Pittsburgh, PA 15219
P: (412) 391-7135
F: (412) 471-2673